

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

SCANSOFT, INC.,

Plaintiff,

V.

C.A. No. 04-10353-PBS

VOICE SIGNAL TECHNOLOGIES, INC.,
LAURENCE S. GILLICK, ROBERT S.
ROTH, JONATHAN P. YAMRON, and
MANFRED G. GRABHERR,

Defendants.

VOICE SIGNAL'S ASSENTED-TO MOTION FOR IMPOUNDMENT

Defendant and counterclaim plaintiff Voice Signal Technologies, Inc. (“Voice Signal”) moves pursuant to Local Rule 7.2 and section 14 of the parties’ agreed-to Protective Order for an order impounding Voice Signal’s Memorandum in Opposition to ScanSoft’s Motion to Compel Deposition Testimony, which is being filed concurrently by hand.

As grounds for this motion, Voice Signal states that its Memorandum in Opposition cites to and quotes from ScanSoft's Memorandum in Support of Motion to Compel Deposition Testimony and For Sanctions, which was filed under seal, and the transcripts of the depositions of Daniel Roth and Jordan Cohen, which were filed under seal by ScanSoft along with its Memorandum and which Voice Signal has designated as containing confidential information pursuant to the parties' Protective Order. Pursuant to section 14 of the parties' Protective Order, which was entered by the Court on March 11, 2005, any documents filed with the Court that disclose confidential information, as defined by the Protective Order, must be filed under seal.

WHEREFORE, Voice Signal requests that the Court enter an order impounding its Memorandum in Opposition to ScanSoft's Motion to Compel Deposition Testimony. Voice Signal further request that the Court grant it leave, pursuant to Local Rule 7.2(d), to file its Memorandum in Opposition to ScanSoft's Motion to Compel Deposition Testimony under seal concurrently with this motion for impoundment.

Respectfully submitted,

Dated: April 22, 2005

VOICE SIGNAL TECHNOLOGIES, INC.

By its attorneys,

/s/ Paul E. Bonanno

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CERTIFICATE PURSUANT TO LOCAL RULE 7.1

I certify that counsel for Voice Signal conferred with counsel for ScanSoft on April 22, 2005 in an effort to resolve the issues presented in this motion and that counsel for ScanSoft assented to this motion.

/s/ Paul E. Bonanno